

For the attention of the A303Stonehenge Team

The Society of Antiquaries last responded on the proposals for the A303 tunnel under a portion of the landscape round Stonehenge in April 2018. We welcome the opportunity to revisit our comments made then in the light of the Statement of Matters of 30 November 2021 and the subsequent set of reports from National Highways (NH) responding to the issues still under consideration.

The Society has not considered the alternative routes for the A303 either north or south of the WHS as being viable or realistic.

Our comments relate primarily to the issue of the length of the tunnel under the Stonehenge landscape, and to the NH document on Alternatives. In our April 2018 response to NH's (then Highways England's) consultation on the A303 route, we commented in some detail on the impact of the proposed tunnel and its western access roads. It remains the case that any highways engineering works on the proposed layout for the A303/A360 junction, on the western tunnel portal and its approach/exit cutting which slices through the WHS landscape, as well as on the eastern entrance to the tunnel need to be minimised to avoid damage to the outstanding universal value (OUV) represented by Stonehenge and its surrounding landscape.

We note the presence of significant archaeology at the eastern portal of the proposed tunnel, but respect the view expressed by the World Heritage Committee/ICOMOS mission that this portal is in the least impactful position available close to the eastern boundary of the WHS.

Our comments therefore focus on the western approaches/exit to the tunnel, where both the cutting and the junction with the A360 have significant impacts on the heritage value of the WHS. NH have restated their assessments of both the cut and cover tunnel extension to the WHS western Boundary and of an extension to the bored tunnel to 600m beyond the WHS western boundary. The Society does not support a cut and cover western extension to the tunnel, since this would have no greater merit in terms of any reduction in impact on the heritage of the WHS than the current scheme submitted for determination in November 2018.

The Society, however, considers that the extension of a twin bored tunnel to emerge beyond the WHS would be of significant benefit to the protection and preservation of the OUV of the Stonehenge WHS because of the minimising of ground disturbance within the WHS, and the retention of the existing landforms on the approach to the WHS from the west. NH themselves also acknowledge that this option "is assessed as slightly more beneficial than the [Proposed] Scheme" in relation to the heritage issues (NH Response to bullet point 1 – Alternatives, para 4.2.21). In all of our responses in relation to this proposed re-routing of the A303, the Society has been at pains to point out that any surface works, including access for the construction, within the boundary of the Development Consent Order on the line of the new road and tunnel will have impacts – possibly considerable - on the heritage assets that form part of the OUV of the WHS.

The status of Stonehenge and its landscape as a World Heritage Site heightens the international responsibility which the UK Government holds for the protection, conservation, presentation and transmission to future generations of this cultural heritage, having agreed within the World Heritage Convention to do all it can to this end, to the utmost of its own resources. The Society therefore considers that in any review of alternative routes and solutions, the internationally recognised outstanding universal value of the Stonehenge landscape should be given significant consideration.

In recognition of this, the acceptance of the proposed extension of the bored tunnel by 600m westwards would be a major step forwards and demonstrate the seriousness with which the Government takes its responsibilities for national and world heritage.